

**DIVISION OF ADULT INSTITUTIONS**

Deuel Vocational Institution  
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December 16, 2013

Mr. Jim Marshall  
Senior Water Resources Control Engineer  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670-6114

Mr. Marshall:

The California Department of Corrections and Rehabilitation (CDCR), Deuel Vocational Institution (DVI), with the assistance of Allan Briggs, PE, Senior Project Manager representing GHD Consulting, has reviewed the Board's Preliminary Draft of DVI's Tentative Waste Discharge Requirements Order R5-2014-xxxx (NPDES No. CA0078093). And have formulated the following questions:

- Under Attachment E, Page E-3, Table E-1 Monitoring Station Locations:

RSW-003 is located in Paradise cut, 1000 feet East of the confluence with Deuel Drain. This point is not an accessible point from which samples can be taken due to the terrain at that location. We request the RSW-003 be located 900 feet East of the confluence with Deuel Drain. This point is accessible for sampling.

- Under Attachment E, Page E-10, Note 3 reads:

"Report daily minimum hourly UV dose and daily average UV dose. The minimum hourly average dose shall consist of lowest hourly average dose provided in any channel that had at least one bank of lamps operating during the hour interval. For channels that did not operate for the entire hour interval, the dose will be averaged based on the actual operation time."

The first sentence seems to indicate that there should be twenty four (24) entries for a given day that are the recorded minimum doses for each hour and one (1) entry for the daily average dose. The next sentence states minimum hourly average dose consisting of lowest hourly average dose, which would imply one (1) entry for a twenty four (24) hour period of the lowest hourly average dose. Should the first sentence also indicate the minimum hourly average instead of the daily minimum hourly? The first and second sentence does not appear to be the same with regards to the minimum dose. Please clarify what is required.

In conclusion, CDCR recognizes that the Central Valley Regional Water Quality Control Board has no legal obligation to respond to the information provided in this document however DVI would appreciate any consideration pertinent to the information provided. If you should have any further questions or concerns, you may contact me at (209) 830-3932.



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